

FILED

FEB 16 2022

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

)

Plaintiff,

)

v.

)

CHUNY ANN REED,

)

Defendants.

)

4:22CR090 AGF/SRW

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

On or about February 5, 2022, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**CHUNY ANN REED,**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base and fentanyl, Schedule II controlled substances,

In violation of Title 21, United States Code, Section 841(a)(1), and

That the serious bodily injury of M.T., a person whose identity is known to the Grand Jury, resulted from the use of such fentanyl and cocaine base so distributed by the defendant, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(C).

## **COUNT II**

The Grand Jury further charges that:

On or about February 5, 2022, in the City of St. Louis, Missouri, within the Eastern District of Missouri,

**CHUNY ANN REED,**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base and fentanyl, Schedule II controlled substances,

In violation of Title 21, United States Code, Section 841(a)(1).

## **FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts I and II, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Counts I and II.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

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